

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF ADVO (ADVO/USPS-T19-1, 3-5),
REDIRECTED FROM WITNESS STEVENS
(July 28, 2006)

The United States Postal Service hereby provides its response to the following interrogatories of Advo, filed on July 14, 2006: ADVO/USPS-T19-1, 3-5, redirected from witness Stevens.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2992, FAX -5402
July 28, 2006

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF ADVO, REDIRECTED FROM WITNESS STEVENS**

ADVO/USPS-T19-1. USPS LR-L-1 states:

Each evaluated rural carrier is paid a salary determined by the evaluated time for his or her route. The evaluated time is developed based on route factors such as route length; boxes served; the number of letters delivered; the number of papers, magazines, and catalogs delivered; and box holder mail volume. These route factors are measured in periodic regular counts, called "National Rural Mail Counts," and, when circumstances dictate, in special counts. During a National Rural Mail Count, all mail for nearly all rural routes is counted by shape (but not by class), and the actual time for individual routes is recorded daily during a two to four-week period (typically during February and March). The mileage, number of boxes, volume of mail, and other applicable items provide a value for evaluated time used to determine the pay for individual routes.

Once the evaluation is performed on his route, please identify the ways in which a rural carrier's weekly salary may change as a result of workload changes prior to another "mail count" evaluation being performed. Please include in that response a discussion of when the rural carrier may receive overtime compensation.

RESPONSE: Increases or decreases in the number of customer mail

receptacles delivered and miles traveled will change the route evaluation in increments of 60 minutes.

Carriers are paid overtime based on Fair Labor Standards Act. Regular carriers will receive overtime if they work over 12 hours a day, 56 hours a week, or 2080 hours during the year. They will receive their weekly compensation and additional compensation when they are entitled to overtime.

Replacement carriers get overtime when they work over 40 hours a week. All hours are paid at an hourly rate and any hours over 40 is overtime.

Replacement carriers are no longer entitled to the evaluation of the route when they go over 40 hours in a week.

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ADVO/USPS-T19-3. Referring to page 7 of USPS LR-L-70, please provide definitions that differentiate among the variables called "Total Hours," "Total Minutes," and "Actual Hours.

RESPONSE "Total Hours" refers to the actual hours per week at which a route is evaluated. This would be the sum total of the weekly time values of the route developed from the standards. The "Total Minutes" is the minutes associated with the "Total Hours." "Actual Hours" are the average weekly hours that the carrier actually used during the mail count period.

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ADVO/USPS-T19-4. For a particular year, are earlier workload counts for a route ever used with current year evaluation time standards to determine evaluated times? If so, please explain the circumstances where this is done.

RESPONSE: Evaluation time standards are established with involvement by the union and do not frequently change. If there are major revisions in evaluation time standards, such as in 2002, there would tend to be concurrent new workload counts for every route, such as in 2002. Retroactive application of new evaluation time standards to previous workload counts, such as contemplated in the question, would likewise involve the union.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
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ADVO/USPS-T19-5. If routes are ever excluded from the annual NMC, please explain the reasons why that may occur.

RESPONSE: Normally, the contractual provisions for national mail count allow managers or carriers to “option” in or out of a mail count. In 2006 all vacant and auxiliary route were scheduled to be counted. Additionally, all other routes counted were routes on which either the employer or the employee optioned for a mail count. Routes not counted were those routes that neither the employer nor employee elected to count.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Rules of Practice and Procedure.

Eric P. Koetting

475 L'Enfant Plaza West, S.W.
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